

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

FlavaWorks Entertainment, Inc.,)	
Blatino Media, Inc.,)	
Plaintiff,)	Case No. : 1:24-cv-09725
)	
v.)	
)	JURY TRIAL DEMANDED
John Doe 1, et al)	
Defendants.)	

PLAINTIFFS' MOTION FOR ALTERNATIVE SERVICE ON DEFENDANT GREGORY

GHAZAL

Plaintiffs, by and through undersigned counsel, respectfully move this Court pursuant to Rule 4(e)(1) of the Federal Rules of Civil Procedure and 735 ILCS 5/2-203.1 for leave to effectuate service of process upon Defendant Gregory Ghazal by electronic mail and supplemental certified mailing. In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs have made multiple diligent attempts to personally serve Defendant Gregory Ghazal at two residential addresses in Miami, Florida, both of which are associated with Defendant based on property records and information obtained via third-party subpoenas.
2. The first address, 341 NW 61st Avenue, Miami, Florida 33126, is solely owned by Defendant Ghazal according to official property records.
3. A professional process server attempted service at this address on January 17, 2025, at approximately 7:20 a.m. Although a silver Toyota with a Florida license plate was observed at the property, no one answered the door. A video doorbell was visible.

4. A second attempt was made at the same address on January 18, 2025, at approximately 3:25 p.m., at which time a Nissan Versa with a Florida license plate was present, but again, no one answered the door.

5. A third attempt was made at that location on January 23, 2025, at 5:30 p.m. The process server observed no movement inside the home and again received no response. Surveillance cameras were visible on the property.

6. A second address associated with Defendant is 15434 SW 114th Street, Miami, Florida 33196. This property is co-owned by Gregory Ghazal. Additionally, Yahoo subpoena results confirmed Defendant's ZIP code as 33196, corresponding to this residence.

7. A professional process server attempted service at this second address on July 22, 2025, at 6:05 p.m. Two vehicles were observed a Toyota with a Florida license plate and a Nissan with a Florida license plate, but no one responded to the door.

8. Additional attempts were made at this location on July 26, 2025, at 7:45 p.m. and July 30, 2025, at 6:43 p.m., with the Toyota vehicle consistently observed in the driveway but with no response at the door.

9. A final attempt was made on August 5, 2025, at 10:14 a.m. No vehicles were present and again no one answered the door.

10. Despite repeated and diligent efforts to effectuate personal service at both known addresses, Plaintiffs have been unable to serve Defendant.

11. Plaintiffs have direct knowledge that Defendant uses the email address lilraverprep921@yahoo.com, and that this email account is active and monitored by Defendant. Defendant previously communicated using this email account with Plaintiff's CEO, Phillip Bleicher, further confirming that the account is valid and in regular use.

12. Rule 4(e)(1) of the Federal Rules of Civil Procedure permits service by any method allowed by the state in which the district court is located. Illinois law permits alternative service where personal service has been impracticable and the alternative method is likely to give the defendant notice of the lawsuit. 735 ILCS 5/2-203.1.

13. Plaintiffs propose serving Defendant by emailing the alias summons, Second Amended Complaint, and all exhibits to lilraverprep921@yahoo.com with delivery and read receipt enabled.

14. Plaintiffs also propose supplementing the email service with certified mailing of the same documents to both addresses referenced above: 341 NW 61st Avenue and 15434 SW 114th Street, both in Miami, Florida.

15. Plaintiffs believe that this method of service is reasonably calculated to provide actual notice and satisfies due process.

16. Plaintiffs respectfully request that this Court grant leave to effectuate service of process upon Defendant Gregory Ghazal by email to lilraverprep921@yahoo.com and by certified mail to the two addresses stated herein.

Dated: September 10, 2025

Respectfully submitted,

/s/Hameed Odunewu
Attorney for Plaintiff

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